

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

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UNITED STATES OF AMERICA

v.

3:14-CR-293-M

JOHN WILEY PRICE (01)

**ECF**

a.k.a John Wiley Price III

KATHY LOUISE NEALY (02)

DAPHENY ELAINE FAIN (03)

Motion for Limited Unsealing of Plea Agreement Supplement

The government moves for an order allowing disclosure of the plea agreement supplement for co-defendant Christian Campbell.

Co-defendant Campbell is a potential witness for the trial of *United States v. Helena Tantillo*; WDTX No. 1:15-CR-0162-SS set for January 19, 2016, and *United States v. John Wiley Price, et. al.*; No. 3:14-CR-293-M set for September 9, 2016. The United States needs to share the plea agreement supplement with defense counsel in order to meet potential *Brady* and *Giglio* obligations.

The government asks that these documents otherwise remain under seal as is the custom and practice in the Northern District of Texas.

**CONCLUSION**

Wherefore, the United States respectfully requests that this Court issue an order authorizing the government to share copies of the plea supplement with defense counsel for purposes of meeting potential *Brady* and *Giglio* obligations.

Respectfully submitted,

JOHN R. PARKER  
UNITED STATES ATTORNEY

s/ *Walt M. Junker*

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CERTIFICATE OF CONFERENCE

On December 18, 2015, I sent defense counsel a rough draft of this notice via electronic mail for purposes of conference. Counsel have told me that they are unopposed to the motion.

s/ *Walt M. Junker*

Walt M. Junker  
Assistant United States Attorney

CERTIFICATE OF SERVICE

I hereby certify that on December 22, 2015, correct copies of this document were served on counsel for the above defendants by electronically filing the pleading with the clerk of court for the U.S. District Court, Northern District of Texas using the ECF system.

s/ *Walt M. Junker*

Walt M. Junker  
Assistant United States Attorney